

REMARKS

Claims 1-14, 16-22, 24, 26, 28 and 30 were examined and reported in the Office Action. Claims 1-14, 16-22, 24, 26, 28 and 30 are rejected. Claims 1, 6, 13 and 18 are amended. Claims 1-14, 16-22, 24, 26, 28 and 30 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. § 103(a)

It is asserted in the Office Action that claims 1-14 and 16-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cheng, U.S. Patent Application Publication No. 2002/0078161 ("Cheng") in view of Ayyagari et al., U.S. Patent Application Publication No. 2002/0033554 ("Ayyagari "). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Applicant previously submitted a 37 C.F.R. 1.131 declaration asserting that the Cheng and Ayyagari are not valid prior art documents as Applicant had conceived the claimed invention and was diligent in filing the above-mentioned patent application. Applicant respectfully disagrees that the submitted reasons are not good and sufficient reasons why the declaration and evidence are necessary and why the declaration and evidence were not previously submitted.

Applicant, however, has amended claims 1, 6, 13 and 18 as follows. Applicant's amended claim 1 contains the limitations of

an electronic device for coupling to a home network system, the electronic device having a memory device, the memory device contains a remote location's complete address to a page storing one of control and characteristic information for the electronic device, one of the control and the characteristic information is retrieved from the remote location if the home network system does not have the one of control and the characteristic information stored, the home network system achieves plug-n-play like operability for the electronic device without using a plug and play protocol, and the device does not transmit service requests.

Applicant's amended claim 6 contains the limitations of

a plurality of electronic devices each including a memory device, each of the memory devices contain a remote location's complete address to a page storing one of control and characteristic information for each electronic device, one of the control and the characteristic information is retrieved from the remote location if a home network system does not have the one of control and the characteristic information stored; a plurality of device specific buses coupled specifically to the plurality of electronic devices; a plurality of device specific network bridge devices coupled specifically to the plurality of device specific buses and the home network; and a device for communicating with a remote network, wherein the home network system achieves plug-n-play like operability for each of the electronic devices without using a plug and play protocol, and each of the plurality of electronic devices do not transmit service requests.

Applicant's amended claim 13 contains the limitations of

generating a request for a device's remote location complete address to a page storing one of control and characteristic information for the device; receiving the requested device's complete address from the device; determining whether characteristic information for the device is previously stored on a home network system; communicating with the remote location if the device's characteristic information is not previously stored on the home network system; retrieving the device's characteristic information if the characteristic information is not previously stored on the home network system; storing the characteristic information not previously stored on the home network system; controlling the device on the home network system, wherein the home network system achieves plug-n-play like operability for the device without using a plug and play protocol, and the device does not transmit service requests.

Applicant's amended claim 18 contains the limitations of

generating a request for a device's remote location complete address to a page storing one of control and characteristic information for the device; receiving the requested device's complete address; determining whether characteristic information for the device is previously stored on a home network system; communicating with the remote location if the device's characteristic information is not previously stored on the home network system; retrieving the device's characteristic information if the characteristic information is not previously stored on the

home network system; storing the characteristic information not previously stored on the system; and controlling the device on the home network system, wherein the home network system achieves plug-n-play like operability for the device without using a plug and play protocol, and the device does not transmit service requests.

Cheng discloses a UPnP controller 120 that uses the UPnP protocol to communicate with UPnP enabling device 200. UPnP enabling device 200 includes an IP network interface that receives commands and requests from the UPnP controller 120 using UPnP protocol and slave network interfaces, and transforms the UPnP protocol to device and network specific commands and requests. “These device and network specific commands and requests are communicated to the controlled non-UPnP device, via the slave network, using the slave network’s protocol.” (Cheng, Abstract). The UPnP enabling device 200 also includes “enabling logic to support the UPnP addressing, discovery, and description processes for each of the devices on the non-IP network. (*Id.*) In other words, the UPnP enabling device 200 acts as an emulator by translating UPnP protocol and non-UPnP protocol to one another. Therefore, Cheng does not teach, disclose or suggest “the home network system achieves plug-n-play like operability for the electronic device without using a plug and play protocol.”

Applicant’s claimed invention includes at least one device that either has its ID read from a memory or simply transmits its ID. Applicant’s claimed invention, however, does not transmit service requests. Distinguishable, in Ayyagari, a universal plug and play component includes functionality for sending a service discovery request from a piconet device to an external device. (see, e.g., Ayyagari, Claim 3).

Further, it is asserted in the Office Action that Ayyagari achieves plug and play operability without using a plug and play protocol. Ayyagari, however, discloses that “[t]he UPnP Device Protocols 575 and an underlying UPnP Device Architecture 570 interact with the BT protocol stack” and “UPnP Device Control Protocols 575, and UPnP Device Architecture 570 handle subsequent operations via the BT protocol stack.” (Ayyagari, paragraphs [0057]-[0058]).

Therefore, Ayyagari does not teach, disclose or suggest the home network system achieves plug-n-play like operability for each of the electronic devices without using a plug and play protocol, and each of the plurality of electronic devices do not transmit service requests.

Moreover, even if the disclosures of Cheng and Ayyagari were combined, the resulting invention of Cheng and Ayyagari still use UPnP protocols with devices that transmit service requests. Since neither Cheng, Ayyagari, and therefore, nor the combination of the two, teach, disclose or suggest all the limitations of Applicant's amended claims 1, 6, 13 and 18, as listed above, Applicant's amended claims 1, 6, 13 and 18 are not obvious over Cheng in view of Ayyagari since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly or indirectly depend from amended claims 1, 6, 13 and 18, namely claims 2-5 and 24, 7-12 and 26, 14, 16-17 and 28, and 19-22 and 30, respectively, would also not be obvious over Cheng in view of Moyer for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejections for claims 1-14 and 16-30 are respectfully requested.

CONCLUSION

In view of the foregoing, it is submitted that claims 1-14, 16-22, 24, 26, 28 and 30 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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Dated: December 22, 2006

By: _____

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CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being submitted electronically via EFS Web on the date shown below to the United States Patent and Trademark Office.



Jean Svoboda

Date: December 22, 2006